



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, N.Y. 10007-2601

**MICHAEL A. CARDOZO**  
*Corporation Counsel*

phone: (212) 788-1578  
fax: (212) 788-1619  
email: samron@law.nyc.gov

May 15, 2009

By Hand

Hon. Shira A. Scheindlin  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, New York 10007

Re: *In re Methyl Tertiary Butyl Ether (MTBE) Products Liability Litigation*,  
MDL No. 1358, Master File No. 1:00-1898 (SAS)  
This document relates to:  
*City of New York v. Amerada Hess, et al.*, 04 CV 3417 (SDNY)

Dear Judge Scheindlin:

Enclosed is a binder with a copy of the City of New York's opposition to Defendants' Joint Motion and Motion in Limine to Exclude the Opinion of the City's Expert Harry T. Lawless. The binder contains the following documents:

The City's Memorandum of Law in Opposition to the Joint Motion;

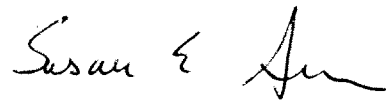
Declaration of Todd E. Robins in Opposition to the Joint Motion, with Exhibits 1-2;

Declaration of Harry T. Lawless, Ph.D. in Opposition to the Joint Motion, with Exhibits 1-8;

Declaration of Andrew E. Schulman, Ph.D. in Opposition to the Joint Motion, with Exhibits 1-3;

Declaration of Steven C. Schindler in Opposition to the Joint Motion.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Susan E. Amron". The signature is fluid and cursive, with a prominent initial "S" and a stylized "A".

Susan E. Amron  
Deputy Chief  
Environmental Law Division

c: All Counsel (via LNFS)